

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

VIRTAMOVE, CORP.,

Plaintiff,

v.

INTERNATIONAL BUSINESS MACHINES  
CORP.,

Defendant.

Case No. 2:25-CV-00619-JRG-RSP

**JURY TRIAL DEMANDED**

**JOINT MOTION TO STAY ALL DEADLINES AND NOTICE OF SETTLEMENT**

Plaintiff VirtaMove (“Plaintiff”) and Defendant International Business Machines Corp. (“Defendant”) (together the “Parties”) file this Joint Motion to Stay All Deadlines and Notice of Settlement to notify the Court that the Parties have reached a settlement in principle as to all matters in controversy between them. As such, the Parties respectfully request that all remaining case deadlines be stayed for thirty (30) days while the Parties finalize a settlement agreement and file dismissal papers with the Court. It is in the interest of judicial economy to grant this Joint Motion.

For the foregoing reasons and good cause shown, the Parties respectfully request the Court enter an order staying all remaining case deadlines for thirty (30) days.

Dated: September 11, 2025

Respectfully submitted,

/s/ Reza Mirzaie

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*International Business Machines Corp.*

**CERTIFICATE OF CONFERENCE**

The undersigned certifies that counsel for Plaintiff conferred with counsel for Defendant, and this is a joint motion.

/s/ Reza Mirzaie

**CERTIFICATE OF SERVICE**

The undersigned certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via CM/ECF on September 11, 2025.

/s/ Reza Mirzaie